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FAX 202-457-6113 WRITER'S DIRECT DIAL NUMBER (202) 457-8646

December 14, 1994

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

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DEC 1 4 1994

FEDERAL COMMENCATIONS COMMISSION OFFICE OF SECRETARY

Re: Notice of Ex Parte Contact PR Docket No. 93-61

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's Rules, notice is hereby given of an ex parte communication regarding the above-referenced proceeding. The instant notice is being submitted in duplicate.

On December 14, 1994, Donald R. Gray, President of MobileVision, L.P., and I, as counsel to MobileVision, L.P., met with Bruce A. Franca, Deputy Chief Engineer of the Office of Engineering and Technology, and in a separate meeting, with Rosalind K. Allen, Acting Chief of the Commercial Radio Division, and F. Ronald Netro, Assistant Engineer of the Wireless Telecommunications Bureau, to discuss various matters relating to the issues in this proceeding. The materials provided at those meetings are attached hereto.

Please associate this notice with the record in this proceeding.

Sincerely,

REED SMITH SHAW & McGLAY

John J. McDonnell

JJM/aqw

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(202) 457-8646

December 14, 1994

Mr. Bruce A. Franca
Deputy Chief Engineer
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002-A
Washington, D.C. 20554

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10EC 1 4 1994

PEDETAL COMMANDATIONS COMMISSION

OFFICE OF SECRETARY

Re: Ex Parte Submission PR Docket No. 93-61

Dear Mr. Franca:

As a result of our meeting in your offices yesterday, MobileVision has prepared the suggested technical parameters and restrictions on wideband LMS services that are attached hereto. These suggestions are designed to alleviate any concerns in OET (or elsewhere in the Commission) regarding interconnected voice and data services made available to LMS systems under the Final Rules being considered in this proceeding. They are designed to make clear that such restricted services are clearly differentiated from PCS type services. These restrictions also would make clear that location is the primary service that must be offered over an LMS licensed system.

MobileVision is open to discuss any further restrictions on LMS operations that would be necessary to mitigate your concerns.

Sincerely,

John J. McDonnell

JJM/agw Enclosure

Proposed Restrictions on Use of Wideband LMS Systems

MobileVision previously proposed the following definition of LMS:

"Wideband LMS systems are land based, pulse ranging multi-lateration systems that must provide geographical location and may provide data and voice services."

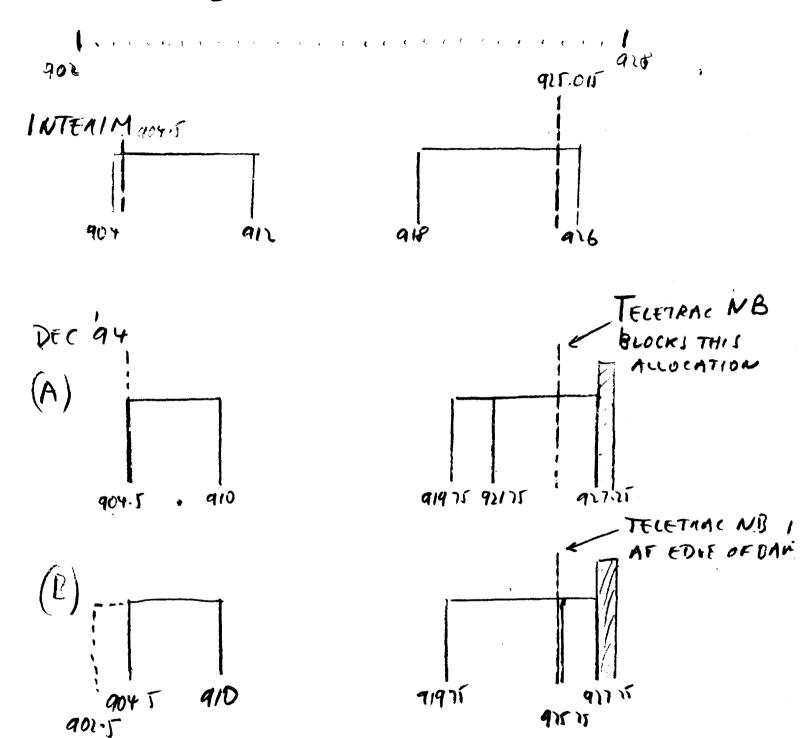
In order to clearly differentiate the service from one in which location is not the primary requirement, the following restrictions are proposed:

- LMS licensed services must be capable of demonstrating location accuracy, in an urban area, within 125m radius of the located unit over 90% of the area served, over 90% of the time.

The following additional restrictions shall apply in connection with the provision of interconnected ancillary voice services:

- a location pulse shall be transmitted from the mobile unit each time a voice call is connected,
- the maximum transmitted power from the LMS fixed site shall be reduced (from 300 W) to 50 W erp,
- the maximum transmitted power from the mobile unit shall be reduced (from 50 W) to 10 W erp."

BAND PLANS.



\$10TES: INTERIM 8+8, could be 2+6, 2+6?
"B" could be 2+5.5, 5.5+2?

CERTIFICATE OF SERVICE

- I, América G. Wear, hereby certify that copies of the foregoing **Ex Parte** filing were forwarded this 14th day of December, 1994 by U.S. first-class mail to the following individuals:
 - * Chairman Reed E. Hundt Federal Communications Commission 1919 M Street, NW, Room 814 Washington, DC 20554
 - * Commissioner Andrew C. Barrett Federal Communications Commission 1919 M Street, NW, Room 826 Washington, DC 20554
 - * Commissioner Rachelle B. Chong Federal Communications Commission 1919 M Street, NW, Room 844 Washington, DC 20554
 - * Commissioner Susan Ness Federal Communications Commission 1919 M Street, NW, Room 832 Washington, DC 20554
 - * Commissioner James H. Quello Federal Communications Commission 1919 M Street, NW, Room 802 Washington, DC 20554
 - * Ruth Milkman Senior Legal Advisor Office of the Chairman Federal Communications Commission 1919 M Street, NW, Room 814 Washington, DC 20554

- * Lauren J. Belvin
 Senior Legal Advisor
 Rudolfo M. Baca
 Legal Advisor
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- * David R. Siddall
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- * Jill M. Luckett
 Office of Commissioner Rachelle B. Chong
 Federal Communications Commission
 1919 M Street, NW, Room 844
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- * James R. Coltharp
 Office of Commissioner Andrew Barrett
 Federal Communications Commission
 1919 M Street, NW, Room 826
 Washington, DC 20554
- * F. Ronald Netro
 Engineering Assistant to the Chief
 Wireless Telecommunications Bureau
 Federal Communications Commission
 2025 M Street, NW, Room 5002
 Washington, DC 20554
- * Rosalind K. Allen, Acting Chief Land Mobile & Microwave Division Wireless Telecommunications Bureau Federal Communications Commission 2025 M Street, NW, Room 5202 Washington, DC 20554
- * Martin D. Liebman, Deputy Chief Wireless Telecommunications Bureau Federal Communications Commission 2025 M Street, NW, Room 5126 Washington, DC 20554

Bruce A. Franca, Deputy Chief Engineer Office of Engineering and Technology Federal Communications Commission 2025 M Street, NW, Room 7002-A Washington, DC 20554

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América G. Wear